Virginia Title V Operating Permit

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Bassett Furniture Industries	Registration Number:	30284
Facility Name:	Bassett Table Co. and Bassett Superior Lines	AIRS Number:	51-089-0033
Facility Location:	2611-2613 Fairystone Park Hwy. Bassett, Virginia	Permit Number:	VA-30284

Effective Date: **March 1, 2002**

Expiration Date: **March 1, 2007**

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Robert G. Burnley Signature Date
Director, Department of Environmental Quality

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Bassett Furniture Industries
Bassett Table Co. and Bassett Superior Lines

I. Facility Information

Permittee
Bassett Furniture Industries
P.O. Box 626
Bassett, Virginia 24055

Responsible Official
Keith R. Sanders
Executive Vice President of Operations

Facility
Bassett Table Co. and Bassett Superior Lines
2611 - 2613 Fairystone Park Hwy.
Bassett, Virginia

Contact Person
Lynwood Scott
Environmental Coordinator
540/629-6240

Registration Number: 30287
AIRS Identification Number: 51-089-0012

Facility Description: SIC Code 2511 – This source consists of 2 plants, Bassett Table Co. and Bassett Superior Lines, which are operated by Bassett Furniture Industries, Inc. as two separate facilities. The two facilities belong to the same industrial group, are adjacent, and are under common ownership; therefore, they are considered as one stationary source. Each facility has its own manager. Due to financial conditions, the Bassett Table Co. plant has been temporarily shut down, however, this Title V permit will be issued for the entire source including Bassett Superior Lines and Bassett Table Co.

Portions of the source are covered by a permit while other portions of the source have never been required to be permitted. Non-permitted emissions units include 2 wood/coal-fired boilers (each 75 MMBtu/hr), 8 wood drying kilns, 16 woodworking dust collection systems, 3 finishing lines, a print line, a basecoat line, offline spray booths, dipping operations and gluing operations.

The facility has 1 NSR permit dated September 2, 1999. This permit was used to supersede and rescind several previous permits. Equipment covered by this permit include:

- Bassett Table woodworking dust collection systems T-WW 2 and 6;
- Bassett Superior Lines woodworking dust collection systems S-WW 1, 10 and 12;
- associated woodworking equipment

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Emission Unit Description	Capacity/Size	Pollution Control Device (PCD)	PCD ID	Applicable Permit Date
Fuel Burning Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
BL1	Union Iron Works wood/coal fired boiler -- #6346	75 MMBtu/hr	Multicyclone	CDMC1	N/A
BL2	Keeler wood/coal fired boiler -- SN:14629	75 MMBtu/hr	Multicyclone	CDMC2	N/A
Woodworking Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
T-WW	Woodworking dust collection systems at Bassett Table	Various	7 Fabric filters	**T-CDBF** 1, 3, 4, 5, 7, 8 and 9	N/A
S-WW	Woodworking dust collection systems at Bassett Superior Lines	Various	9 Fabric filters	**S-CDBF** 2, 3, 4, 5, 6, 7, 8, 9 and 11	N/A
Woodworking Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
T-WW	Woodworking dust collection systems at Bassett Table	Various	2 Fabric filters	**T-CDBF** 2 and 6	9/2/99
S-WW	Woodworking dust collection systems at Bassett Superior Lines	Various	3 Fabric filters	**S-CDBF** 1, 10 and 12	9/2/99
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
T-FN1	Finishing operations at Bassett Table • Finishing line #1 with 14 spray booths and 4 ovens, 1 off-line spray booth, and 1 washoff tank • Finishing line #2 with 11 spray booths and 3 ovens, 3 off-line spray booths, 1 washoff tank, 1 dip tank, and 1 roll coater	Various	none	N/A	N/A
S-FN1	Finishing operations at Bassett Superior Lines • Finishing line with 13 spray booths and 3 ovens, 5 off-line spray booths and 1 oven, and 1 dip tank, • 3 Print lines with 1 rollcoater, 1 air flash oven, 2 roll print machines, and 3 IR ovens	Various	baffle particulate filters on SB8 and SB13		N/A

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Fuel Burning Equipment Requirements – wood/coal-fired boilers

Union Iron Works - 75 MMBtu/hr (BL1)
Keeler - 75 MMBtu (BL2)

A. Limitations

1. Particulate emissions from the Union Iron Works (BL1) wood/coal-fired boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection. An annual inspection shall be conducted on the multicyclone by the permittee to insure structural integrity.
(9 VAC-40-20 E, 9 VAC 5-80-110 C)

2. Particulate emissions from the Keeler (BL2) wood/coal-fired boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection. An annual inspection shall be conducted on the multicyclone by the permittee to insure structural integrity.
(9 VAC-40-20 E, 9 VAC 5-80-110 C)

3. Emissions from the operation of the Union Iron Works (BL1) and Keeler (BL2) boilers shall not exceed the limits specified below:

Particulate Matter	0.297 lbs/MMBtu
PM_{10}	0.297 lbs/MMBtu
Sulfur Dioxide	198.0 lbs/hr, each

(9 VAC 5-40-900, 9 VAC 5-40-930, 9 VAC 5-80-110 B)

4. Visible emissions from the Union Iron Works (BL1) and Keeler (BL2) boiler exhausts shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-40-940, 9 VAC 5-80-110 K)

5. Boiler emissions shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum.
(9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. Operation & Maintenance Procedures - The permittee shall take the following actions to ensure the Union Iron Works (BL1) and Keeler (BL2) boilers are operating in a manner to maintain compliance with the visible and particulate emissions standards:

At least once during each work shift that the boiler is operating the boiler operator shall record in a data log the date, boiler operator, time of readings, boiler startup time, boiler shutdown time, steam production (in lbs/hr), underfire flow, percent O_2, furnace draft, ID fan damper (%), multicyclone magnehelic, coal flow, wood flow, ID fan amperage, FD fan amperage, overfire fan amperage, ash raking start time, ash raking stop time, and operator comments.

Records of maintenance, inspections and training shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110 E, EPA Consent Decree Section IV.B.1.e and C.1. dated 10/15/99)

2. Visible Emissions: - Each boiler shall be observed visually at least once each calendar week in which the boiler operates. The visual observations shall be conducted using 40 CFR 60 Appendix A Method 22 techniques (condensed water vapor/steam is not a visible emission) for at least a brief time to only identify the presence of visible emissions. Each boiler in the Method 22 technique observation having visible emissions shall be evaluated by conducting a 40 CFR 60 Appendix A Method 9 visible emissions evaluation (VEE) for at least six (6) minutes, unless corrective action is taken that achieves no visible emissions. 40 CFR 60 Appendix A Method 9 requires the observer to have a Method 9 certification that is current at the time of the VEE. If any of these six (6) minute VEE averages exceed the boiler's opacity limitation, a VEE shall be conducted on the boiler for at least 3 six-minute periods (at least 18 minutes).

   The permittee shall maintain a boiler stack observation log for each boiler to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.
   (9 VAC 5-80-110 E, EPA Consent Decree Section IV.B.1.e and C.1. dated 10/15/99)

3. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Union Iron Works (BL1) and Keeler (BL2) boilers, with respect to air pollution control equipment and process equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance for the Union Iron Works (BL1) and Keeler (BL2) boilers, any appurtenance to the Union Iron Works (BL1) and Keeler (BL2) boilers which is essential to the operation of the boiler, and for the Union Iron Works (BL1) and Keeler (BL2) boiler multicyclones.

   b. Instrumentation must be calibrated at least once annually. Any instrument which malfunctions must be repaired or replaced within 20 days of malfunctioning, or as soon as possible if repair or replacement parts are not available.

c. The stack draft monitors shall be maintained in operable condition at all times.

d. Develop an inspection schedule for the Union Iron Works (BL1) and Keeler (BL2) boilers, annual at a minimum, to insure operational and structural integrity of the boilers and maintain records of inspection results.

e. Develop an inspection schedule for the Union Iron Works (BL1) and Keeler (BL2) multicyclone, annual at a minimum, to insure operational and structural integrity of the control device and maintain records of inspection results.

f. Have available written operating procedures for the Union Iron Works (BL1) and Keeler (BL2) boilers and the Union Iron Works (BL1) and Keeler (BL2) multicyclones. These procedures shall be based on the manufacturer's recommendations, at minimum.

g. Train every person who operates a boiler about proper combustion techniques for producing steam while minimizing particulate emissions at least once per year. No person may operate a boiler without first receiving such training to ensure that the operator is aware of operating in compliance with visible emission and particulate emission limits of the regulations. The permittee shall maintain records of the training provided including the names of trainees, the date of training, the nature of the training, and test scores for each trainee.

(9 VAC 5-40-20 E, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, EPA Consent Decree Section IV.C.1. dated 10/15/99)

4. Recordkeeping - recordkeeping for the Union Iron Works (BL1) and Keeler (BL2) boilers, not otherwise required by this permit, shall consist of the following fuel consumption and operating data:

a. The annual consumption of wood and coal for the Union Iron Works (BL1) boiler.

b. The annual consumption of wood and coal for the Keeler (BL2) boiler.

c. Coal shipments purchased, indicating the sulfur content per shipment.

d. Records of the visible emission and opacity observations from the Union Iron Works (BL1) and Keeler (BL2) boilers as required by Condition III.B.2.

e. Records of the results of required stack tests as required by Condition III.C.1.

f. Copies of the boiler data logs as required by Condition III.B.1.

g. Records of maintenance, inspections, and training for the Union Iron Works (BL1) and Keeler (BL2) boilers as required by Condition I.B.3.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five-(5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-40-50, 9 VAC 5-80-110 F, EPA Consent Decree Section IV.B.1.e and C.1. dated 10/15/99)

C. Testing

1. Beginning with the effective date of this permit, at least once in every 3-year period, the Union Iron Works (BL1) and Keeler (BL2) boilers shall be stack tested for mass particulate emission rate to demonstrate compliance with the emission limits established in Condition I.A.3.
(EPA Consent Decree Section IV.B.1.e. dated 10/15/99)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
SO_2	EPA Method 6
PM/PM-10	EPA Method 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

See General Conditions, Section XI, C. D. E. and F.

IV. Process Equipment Requirements – (T-WW, S-WW)

T-WW -- woodworking operations at Bassett Table
S-WW -- woodworking operations at Bassett Superior Lines

A. Limitations

1. Particulate emissions from the following woodworking dust control systems shall be controlled by fabric filters:

Bassett Table	T-WW 2 and 6
Bassett Superior Lines	S-WW 1, 10 and 12

The fabric filters shall be provided with adequate access for inspection and shall be in operation when the woodworking equipment associated with the dust collection system is operating.
(9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 9/2/99)

2. Fugitive particulate emissions from the collection, transfer, and handling of wood waste from each of the following dust collection systems shall be controlled by a fabric filter, a completely enclosed transfer system, and/or rotary air lock from the collector to an enclosed bin:

Bassett Table	T-WW 2 and 6
Bassett Superior Lines	S-WW 1, 10 and 12

(9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 4 NSR permit dated 9/2/99)

3. Each fabric filter for the following dust control systems shall be equipped with a monitoring device to continuously measure the differential pressure drop across the fabric filter:

Bassett Table	T-WW 2 and 6
Bassett Superior Lines	S-WW 1, 10 and 12

The monitoring device shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements, or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the woodworking equipment associated with the dust collection system is operating.
(9 VAC 5-80-10 H, 9 VAC 5-50-20 C, 9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 5 NSR permit dated 9/2/99)

4. Particulate emissions from the following woodworking dust control systems shall be controlled by fabric filters, or closed loop systems controlled by a fabric filter:

Bassett Table	T-WW 1, 3, 4, 5, 7, 8 and 9
Bassett Superior Lines	S-WW 2, 3, 4, 5, 6, 7, 8, 9 and 11

The fabric filters shall be provided with adequate access for inspection. The fabric filters shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order.
(9 VAC 5-40-20 E, 9 VAC 5-80-110 C)

5. The woodworking dust control system T-WW6 shall not operate more than 7000 hours per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-10 H, 9 VAC 5-80-110, Condition 7 NSR permit dated 9/2/99)

6. The woodworking dust control system S-WW1 shall not operate more than 7000 hours per year, calculated monthly as the sum of the previous consecutive 12 months' operating hours.
(9 VAC 5-80-10 H, 9 VAC 5-80-110, Condition 7 NSR permit dated 9/2/99)

7. The woodworking dust control system S-WW10 shall not operate more than 6000 hours per year, calculated monthly as the sum of the previous consecutive 12 months' operating hours.
(9 VAC 5-80-10 H, 9 VAC 5-80-110, Condition 7 NSR permit dated 9/2/99)

8. Visible emissions from the following dust control systems' fabric filter exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A):

Bassett Table	T-WW 2 and 6
Bassett Superior Lines	S-WW 1, 10 and 12

This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 9 NSR permit dated 9/2/99)

9. Visible fugitive emissions from the collection, transfer, or handling of wood waste for the following dust control systems shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A):

Bassett Table	T-WW 2 and 6
Bassett Superior Lines	S-WW 1, 10 and 12

This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 10 NSR permit dated 9/2/99)

10. Visible emissions from the following woodworking dust control systems shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A):

Bassett Table	T-WW 1, 3, 4, 5, 7, 8 and 9
Bassett Superior Lines	S-WW 2, 3, 4, 5, 6, 7, 8, 9 and 11

(9 VAC 5-40-80, 9 VAC 5-80-110 K)

11. Emissions from the operation of the following fabric filters shall not exceed the limits specified below:

T-CDBF2	PM_{10}	0.01 gr/dscf	12.0 tons/yr
T-CDBF6	PM_{10}	0.01 gr/dscf	14.1 tons/yr
S-CDBF1	PM_{10}	0.01 gr/dscf	13.8 tons/yr
S-CDBF10	PM_{10}	0.01 gr/dscf	14.8 tons/yr

S-CDBF12	PM_{10}	0.01 gr/dscf	14.4 tons/yr

Annual emissions are derived from the estimated overall emission contribution from operating limits and emissions factors. Compliance with annual emission limits shall be determined as stated in Conditions IV. A. 5, 6, 7 and 8.
(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 8 NSR permit dated 9/2/99)

12. Particulate emissions from the following woodworking dust control systems shall not exceed 0.05 grains per standard cubic feet of exhaust gas:

Bassett Table	T-WW 1, 3, 4, 5, 7, 8 and 9
Bassett Superior Lines	S-WW 2, 3, 4, 5, 6, 7, 8, 9 and 11

(9 VAC 5-40-2270, 9 VAC 5-80-110 B)

B. Monitoring and Recordkeeping

1. Visible Emissions: - Each fabric filter listed in the table in Section I of this permit shall be observed visually at least once each calendar week in which the fabric filter operates. The visual observations shall be conducted using 40 CFR 60 Appendix A Method 22 techniques (condensed water vapor/steam is not a visible emission) for at least a brief time to only identify the presence of visible emissions. Each fabric filter in the Method 22 technique observation having visible emissions shall be evaluated by conducting a 40 CFR 60 Appendix A Method 9 visible emissions evaluation (VEE) for at least six (6) minutes, unless corrective action is taken that achieves no visible emissions. 40 CFR 60 Appendix A Method 9 requires the observer to have a Method 9 certification that is current at the time of the VEE. If any of these six (6) minute VEE averages exceed the fabric filter's opacity limitation, a VEE shall be conducted on these emissions for at least 3 six-minute periods (at least 18 minutes).

   The permittee shall maintain a fabric filter exhaust stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, any necessary corrective action, and the observer's name.
   (9 VAC 5-80-110 E)

2. Operation & Maintenance Procedures – The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the fabric filters, with respect to air pollution control equipment and process equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

b. Develop an inspection schedule for the fabric filters, monthly at a minimum, to insure operational integrity of the fabric filters and maintain records of inspection results.

c. Have available written operating procedures for the fabric filters. These procedures shall be based on the manufacturer's recommendations, at minimum.

d. Train operators in the proper operation of the fabric filters, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

e. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-40-20 E, 9 VAC 5-50-20 E, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 18 NSR permit dated 9/2/99)

3. Recordkeeping - Emission monitoring, recordkeeping and reporting not otherwise required by this permit shall consist of the following operating data:

a. The annual hours of operation of dust system T-WW6, calculated monthly as the sum of each consecutive 12-month period.

b. The annual hours of operation of dust system S-WW1, calculated monthly as the sum of each consecutive 12-month period.

c. The annual hours of operation of dust system S-WW10, calculated monthly as the sum of each consecutive 12-month period.

d. Records of the visible emission and opacity observations from the fabric filters as required by Condition IV.B.1.

e. Records of maintenance, inspections, and training for the fabric filters as required by Condition IV.B.2.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five-(5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-40-50, 9 VAC 5-50-50, 9 VAC 5-80-110 F, Conditions 12 & 18 NSR permit dated 9/2/99)

C. Testing

1. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-40-30, 9 VAC 5-50-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM-10	EPA Method 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

See General Conditions, Section XI, C. D. E. and F.

V. Furniture Finishing Requirements – (T-FN1, S-FN1)

T-FN1 -- finishing operations at Bassett Table
S-FN1 -- finishing operations at Bassett Superior Lines

A. Limitations

1. Visible emissions from all spray booths at Bassett Table (T-FN1) and Bassett Superior Lines (S-FN1) including all off-line spray booths shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-40-80, 9 VAC 5-80-110 K)

2. Particulate emissions from the Sealer (#8) and Topcoat (#13) and spray booths at Bassett Superior Lines shall be controlled by baffle particulate filters.
(9 VAC 5-80-110 C)

B. Monitoring and Recordkeeping

1. Visible Emissions: - Each spray booth listed in the table in Section I (including finishing lines and all off-line spray booths) shall be observed visually at least once each calendar week in which the spray booth operates. The visual observations shall be conducted using 40 CFR 60 Appendix A Method 22 techniques (condensed water vapor/steam is not a visible emission) for at least a brief time to identify the presence

of visible emissions. Each spray booth in the Method 22 technique observation having visible emissions shall be evaluated by conducting a 40 CFR 60 Appendix A Method 9 visible emissions evaluation (VEE) for at least six (6) minutes, unless corrective action is taken that achieves no visible emissions. 40 CFR 60 Appendix A Method 9 requires the observer to have a Method 9 certification that is current at the time of the VEE. If any of these six (6) minute VEE averages exceed the spray booth's opacity limitation, a VEE shall be conducted on these emissions for at least 3 six minute periods (at least 18 minutes).

The permittee shall maintain a spray booth exhaust stack observation log to demonstrate compliance. The logs shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observers name.
(9 VAC 5-80-110 E)

2. Operation & Maintenance Procedures – The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the spray booths, with respect to the equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

   b. Have available written operating procedures for the spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.

   c. Train operators in the proper operation of the spray booths, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

   (9 VAC 5-40-20 E, 9 VAC 5-50-20 E, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F)

3. Recordkeeping - Emission monitoring, recordkeeping and reporting not otherwise required by this permit shall consist of the following operating data:

   a. Records of the visible emission and opacity observations from the spray booths as required by Condition V.B.1.

   b. Records of maintenance, inspections, and training for the spray booths as required by Condition V.B.2.

   The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five-(5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary for the purpose of emissions

netting, banking, trading and offsets.)
(9 VAC 5-50-50, 9 VAC 5-80-110 F)

C. Testing

1. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-40-30, 9 VAC 5-50-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
VOC Content	EPA Methods 24, 24a
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

See General Conditions, Section XI, C. D. E. and F.

VI. Facility Wide Conditions

A. Environmental Management Conditions

1. The permittee shall implement the following components of the EPA mandated environmental management plan:

   a. a program of self monitoring which:

      (1) reviews coatings for compliance with 40 CFR Part 63, Subpart JJ;

      (2) maintains and utilizes all Material Safety Data Sheets;

      (3) records the amount and type of each fuel consumed at each coal and/or wood-fired boiler operated by Bassett Table Co. and Bassett Superior Lines; and

      (4) performs weekly visible emission readings on each boiler stack and baghouse at the Bassett Table Co. and Bassett Superior Lines to determine compliance with the applicable visible emission regulations. Any visible emission reading taken by a non-certified observer which finds a possible visible emission limit

exceedance must be re-performed by a certified observer within 8 hours, or as soon as possible if environmental conditions do not permit reading by a certified observer within 8 hours;

b. a mandatory program for providing regular training to managers in charge of production concerning applicable environmental requirements, the need for compliance with those requirements, and how to maintain compliance with environmental requirements;

c. a standard operating procedure for alerting clearly-identified managers of any known or suspected violations of environmental regulations, and a clear delineation as to what person(s) within management are responsible for ensuring that any such violations are brought back into compliance as soon as possible;

d. a mandatory program of continuing education for environmental managers which provides information on new or revised environmental regulations and new methods and control equipment for maintaining compliance;

e. stack tests for mass particulate emission rates for each wood and/or coal-fired boiler at Bassett Table Co. and Bassett Superior Lines. This stack testing must be performed at least once every three years, or more frequently if necessary;

f. a program of environmental audits, for all media, to be conducted on a regular, continuing basis, in order to determine the current compliance status with all applicable federal and state environmental requirements and to rectify any noncompliance discovered.

(9 VAC 5-80-110 B, EPA Consent Decree Section IV.B.1 Dated 10/15/99)

VII. MACT Conditions - 40 CFR 63, Subpart JJ

The facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ, including future revisions (current copy attached). All terms used regarding 40 CFR 63, Subpart JJ shall have the meanings as defined in 40 CFR 63.801 and 40 CFR 63.2.
(9 VAC 5-60-100, 40 CFR 63.800 and 40 CFR 63 Subpart A)

A. Emission Standard

1. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits:

   a. For finishing operations use any of the following methods:

(1) Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids, as applied;

(2) Use compliant finishing materials that meet the following specifications:

(a) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

(b) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

(c) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded by (5) of this sub-section;

(d) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

(e) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;

(3) Use any combination of averaging, compliant coatings, and control device such that no greater than 1.0 lb of VHAP being emitted per lb of solids used;

b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;

c. For contact adhesive operations use compliant contact adhesives that shall be used based on the following criteria:

(1) For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;

(2) For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids, as applied;

(3) For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids, as applied.

(9 VAC 5-60-100 and 40 CFR 63.802)

B. Continuous Compliance

1. Continuous compliance with the VHAP emissions limits shall be determined as follows:

(See Condition VII.H.1. and VII.I.1 for content and timing of report submissions and signature requirements)

a. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The facility is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} +... + M_{cn}C_{cn} + S_1W_1 + S_2W_2 +...+ S_nW_n)/(M_{c1} + M_{c2} +...+ M_{cn})$$

..... Equation 1

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.
M_c = the mass of solids in a finishing material or coating (c) used monthly, including exempt finishing materials and coatings, lb solids/month.
C_c = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.
S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.
W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month (M_c in lb solids / month) multiplied by the VHAP content in each material (C_c in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month (M_c in lb solids / month).

b. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition VII.A.1, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of

the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

c. For finishing operations when compliant coatings are being used to show continuous compliance and the coatings are being applied using continuous coaters the permittee shall demonstrate continuous compliance by either of the following:

(1) Use compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, use compliant thinners, and submit a compliance certification with the semiannual report which states that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

(2) Use compliant coatings, as determined by the VHAP content of the coating in the reservoir, use compliant thinners, maintain a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintain records of solvent additions, and submit a compliance certification with the semiannual report which states that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. The facility is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit, as determined using EPA Method 311 or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.

d. For contact adhesive operations when compliant adhesives are being used to show continuous compliance the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

e. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the

semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

f. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the DEQ may require the permittee to modify the plan.

(9 VAC 5-60-100 and 40 CFR 63.804.(g) & 40 CFR 63.8)

C. Testing

1. If compliance testing is conducted the tests shall be conducted using the test methods and procedures as specified in 40 CFR 63.805 of Subpart JJ.

   (9 VAC 5-60-100, 40 CFR 63.805)

D. Submittals

1. All submittals regarding 40 CFR 63, Subpart JJ shall be sent to the West Central Regional Office, and to EPA Region III at the following address:

   U.S. EPA Region III
   Air Protection Division (3AP00)
   ATTN: Wood Furniture NESHAP Coordinator
   1650 Arch Street
   Philadelphia, PA 19103-2029

   (9 VAC 5-60-100 and 40 CFR 63.13)

E. Operation and Maintenance

1. The permittee shall meet the following operation and maintenance requirements:

   a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

   b. Malfunctions shall be corrected as soon as practicable after their occurrence.

c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-60-100 and 40 CFR 63.6(e))

F. Work Practice Standards

1. The permittee shall develop and implement the following work practice standards:

a. Work practice implementation plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Conditions b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the DEQ upon request. If the DEQ determines that the work practice implementation plan does not adequately address each of the topics specified in '63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the DEQ may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

b. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;

(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

c. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

(2) An inspection schedule;

(3) Methods for documenting the date and results of each inspection and any repairs that were made;

(4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(a) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(b) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

d. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:

(1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of Subpart JJ;

(2) The number of pieces washed off, and the reason for the washoff; and

(3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

e. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in

Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.

f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

h. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

(1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

(2) For touchup and repair under the following conditions:

(a) The touchup and repair occurs after completion of the finishing operation; or

(b) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

(3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

(4) When emissions from the finishing application station are directed to a control device;

(5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

(6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic

infeasiblity by submitting to the DEQ a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasiblity. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasiblity:

(a) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(b) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

i. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

j. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

k. Washoff operations - The permittee shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of Subpart JJ (see attached) that are being used in finishing operations.

(2) Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by §63.803 (l)(2).

For VHAPs that do not have a baseline, one will be established according to Condition vi. below.

(3) Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the DEQ that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(a) The exceedance is no more than 15.0 percent above the baseline level;

(b) Usage of the VHAP is below the de minimis level presented in Table 5 for that VHAP;

(c) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(d) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.

(5) If none of the explanations listed in Condition (4) above is the reason for the increase, the permittee shall confer with the DEQ to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the DEQ and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the DEQ that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition (4) above, the affected source shall follow the procedures established in Condition (5) above.

(9 VAC 5-60-100 and 40 CFR 63.803(a)-(l))

G. Recordkeeping

1. The permittee shall maintain records of the following:

   a. For emission limit purposes the permittee shall maintain the following:

      (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ:

      (2) The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and

      (3) The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.

   b. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.

   c. Following the continuous coating operations, where viscosity is being used to determine compliance, the permittee shall maintain the records required by Condition a. above as well as the following:

      (1) Solvent and coating additions to the continuous coater reservoir;

      (2) Viscosity measurements; and

      (3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.

   d. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

      (1) Records demonstrating that the operator training program required by Condition VII.F.1.b.is in place;

      (2) Records collected in accordance with the inspection and maintenance plan required by Condition VII.F.1.c.;

      (3) Records associated with the cleaning solvent accounting system required by Condition VII.F.1.d.;

(4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Condition VII.F.1.h.;

(5) Records associated with the formulation assessment plan required by Condition VII.F.1.l.; and

(6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

e. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.

f. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.

g. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-60-100 and 40 CFR 63.806 & 63.10(b)(1))

H. Notification of Compliance

1. Each time a notification of compliance status is required regarding Subpart JJ, the permittee shall submit to the West Central Regional Office and the EPA a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:

   a. The methods that were used to determine compliance;

   b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

   c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;

e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);

f. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

g. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

(9 VAC 5-60-100 and 40 CFR 63.9(h))

I. Reporting

1. Reporting with regard to Subpart JJ not otherwise required by this permit shall consist of the following:

   a. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

      (1) The time periods to be addressed are the calendar months **January through June and July through December**. The first report shall be submitted 30 calendar days after the end of each 6-month period.

      (2) The semiannual reports shall include the information required by Condition VII.B.1., a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

      (3) The frequency of the reports required by Condition a. above shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

   b. The permittee, when required to provide a written notification by Condition VII.F.1.l(4) for exceedance of a baseline level, shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

   (9 VAC 5-60-100 and 40 CFR 63.807 & 63.10(d))

VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation 9VAC	Pollutant(s) Emitted	Rated Capacity
S-ST 1 thru 4	naphtha or flat lacquer storage tank	5-80-720B	VOC	2,600 gallons each
S-ST 5 thru 8	sealer or gloss lacquer storage tank	5-80-720B	VOC	3,190 gallons each
S-ST 9 and 10	thinner storage tank	5-80-720B	VOC	3,290 gallons each
S-ST 11	(4) storage tanks	5-80-720B	VOC	360 gallons each
S-ST 12	gasoline storage tank	5-80-720B	VOC	10,000 gallons
S-ST 13	diesel storage tank	5-80-720B	VOC	10,000 gallons
DK	(8) drying kilns	5-80-720B	VOC	100,000 bd.ft. each
S-GL1 and 2, T-GL1	furniture gluing operations	5-80-720B	VOC	<5 tpy

These insignificant emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

IX. Compliance Plan

N/A

X. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
Federal NSPS all sections	--	no equipment at this facility is subject to a federal NSPS

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the

Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

XI. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless a timely and complete renewal application consistent, with 9 VAC 5-80-80, has been submitted, to the West Central Regional Office of the DEQ, by the owner, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant

section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D & 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G. [Note that much of the recordkeeping required by this permit also serves as required periodic monitoring to determine emissions compliance and therefore needs to be addressed in the periodic reports.] The details of the reports are to be arranged with the Director, West Central Regional Office. The reports shall include:

   a. The time period included in the report. The time periods to be addressed are **January 1 to June 30** and **July 1 to December 31**.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

(1) Exceedance of emissions limitations or operational restrictions;

(2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

d. The report shall be sent to the following address:

VA DEQ
Director, West Central Regional Office
ATTN: Air Compliance Manager
3019 Peters Creek Road
Roanoke, VA 24019

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and to DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is **January 1 to December 31**.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

This annual compliance certification shall be sent to the following addresses:

VA DEQ
Director, West Central Regional Office
ATTN: Air Compliance Manager
3019 Peters Creek Road
Roanoke, VA 24019

U. S. Environmental Protection Agency, Region III
Clean Air Act Title V Compliance Certification (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, West Central Regional Office, within four (4) daytime business hours of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the occurrence, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next quarterly or semi-annual compliance monitoring report required by this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

If, for any reason, the affected facilities or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the Director, West Central Regional Office, within four (4) daytime business hours of the occurrence. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shutdown.

(9 VAC 5-20-180 C & 9 VAC 5-80-250)

G. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20, 9 VAC 5-40-20)

H. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.

   d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, telegraph, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2. b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in

addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

(9 VAC 5-80-250)

I. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

J. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

K. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit

termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

L. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

M. Permit Action for Cause

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
(9 VAC 5-80-110 G.4)

2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

   a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is potential of, a resulting emissions increase;

   b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;

   c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase in authorized by an emissions cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;

   d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;

   e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;

f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);

g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

N. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

O. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

P. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

Q. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all

applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

R. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

S. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

T. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

U. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application

was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

AA. Emissions Trading

1. Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

   a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

   b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

   c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

   (9 VAC 5-80-110 I)

XII. State-Only Enforceable Requirements

N/A